

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

**AFFIDAVIT IN SUPPORT OF  
A CRIMINAL COMPLAINT**

I, Brian Arnold, being duly sworn, hereby depose and state:

**TRAINING AND EXPERIENCE OF AFFIANT**

1. I am a Special Agent (SA) with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and have been so employed since 2015. I have completed the Criminal Investigator Training Program, ATF Special Agent Basic Training, ATF Firearms Interstate Nexus Training, and ATF Undercover Operations Training. During my tenure as a Special Agent with the ATF, I have had the opportunity to serve as the lead case agent on federal criminal cases primarily investigating violent crime to include firearms, explosives, and narcotics offenses. I have also directly participated in additional federal criminal cases in a support capacity. As the lead case agent, and also as a supporting agent, I have been involved in, and routinely engage in, conducting interviews, executing federal and state search warrants, recovering evidence of federal crimes, conducting covert surveillance operations, and conducting arrest operations.

**PURPOSE OF AFFIDAVIT**

2. I make this affidavit in support of a criminal complaint charging Lucia Kalakaua PEDRO in violation of Title 21 U.S.C. § 841(a)(1) & (b)(1)(B) Possession with Intent to Distribute Controlled Substances, specifically 100 grams or more heroin.

3. I have participated in the investigation of the offenses set forth below. The facts and information contained in this affidavit are based upon my personal knowledge, as well as information provided to me by other law enforcement officers, and individuals directly involved in the investigation of this case. All observations referenced in this affidavit that were not made by me were related to me by the person who made such observations. Unless specifically indicated, all conversations and statements described in this affidavit are related in substance and in part only and are not intended to be a verbatim recitation of such statements.

4. This affidavit is being submitted for the purpose of establishing probable cause. This affidavit contains facts sufficient to establish probable cause; however, it does not

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contain all of the facts known to me relating to this investigation. As a result of my personal participation, I am familiar with the facts of this investigation. On that basis of that familiarity, I allege the following facts to show that probable cause exists to believe that the location information described in Attachment B will provide evidence of offenses committed by Lucia Kalakaua PEDRO ("PEDRO") as he participates in violations of (a) the possession with intent to distribute controlled substances, in violation of Title 21 U.S.C. § 841(a)(1) & (b)(1)(B).

## **PROBABLE CAUSE**

### **Search Warrant Execution and Interview of PEDRO**

5. On April 17, 2019, agents executed the search warrants (3:19-mj-00134-DMS & 3:19-mj-00167-DMS) on 501 North Park Street, Apt #3, Anchorage, AK 99508. During the search warrant execution, ATF Task Force Officer Allen Adair and I interviewed PEDRO. After being Mirandized PEDRO initially invoked his right to an attorney, however he made further statements and agents asked if he wanted to be Mirandized again and PEDRO indicated that he did. I Mirandized PEDRO again and he waived his right to an attorney. When asked for the combination to a safe that was located in the residence so the agents would not have to break in, PEDRO initially denied knowing. However, he eventually indicated that there were about 4 ounces of heroin in the safe and that the items inside were his. PEDRO also denied that there were firearms and cash in the safe. Once agents gained access to the safe, they found items including 109 grams of suspected heroin (gross weight includes packaging), a revolver, marijuana, two digital scales, and an unopened homemade container that is suspected to contain narcotics intended for body carry that had a gross weight of 167 grams. There was packaging material on top of the safe and throughout the house. There were also 13 grams of suspected heroin (gross weight includes packaging) found inside a hair brush that was inside a diabetic bag, mail correspondence addressed to PEDRO, and male clothing found in the room with the safe (mentioned above). In the kitchen, a pistol was also located.

## **IV. CONCLUSION**

6. Based upon my training and experience, I know that pursuant to Title 21, United States Code, Section 841(a)(1) & (b)(1)(B) that it shall be unlawful for any person to knowingly or intentionally possess with intent to distribute, 100 grams or more of a mixture or substance containing a detectable amount of heroin. Based on the above, your Affiant respectfully submits that there is probable cause to believe that PEDRO was in violation of 21 U.S.C. § 841(a)(1) & (b)(1)(B).



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BRIAN ARNOLD  
SPECIAL AGENT  
BUREAU OF ALCOHOL, TOBACCO,  
FIREARMS and EXPLOSIVES (ATF)

Sworn and subscribed before me in Anchorage, Alaska  
this 12 day of April 2019.

  
UNITED STATES DISTRICT COURT  
DISTRICT OF ALASKA

